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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

March 1, 1996

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D. C. 20554

DOCKET FILE COPY ORIGINAL

In the Matter of:

Price Cap Performance Review)	CC Docket No. 94-1
for Local Exchange Carriers)	Fourth Further Notice of Proposed Rulemaking

Dear Mr. Caton:

Enclosed are an original and nine copies of the Reply Comments of Cincinnati Bell Telephone in the above referenced proceeding. Two additional copies are being provided to the Tariff Division and a computer disk copy of the attached Reply Comments is being provided to the Industry Analysis Division, as instructed in paragraph 152 of the Commission's Fourth Further Notice of Proposed Rulemaking in the above referenced docket. A duplicate original copy of this letter and attached Reply Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Reply Comments may be directed to Ms. Patricia Rupich at the above address or by telephone on (513) 397-6671.

Sincerely,

David L. Meier
Director - Legislative &
Regulatory Planning

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Price Cap Performance Review for Local) CC Docket No. 94-1
Exchange Carriers)

REPLY COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

I. INTRODUCTION

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier ("LEC"), submits these reply comments in response to comments filed concerning the Commission's September 27, 1995 Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding.¹ While CBT does not currently operate under price cap regulation, CBT is participating in this proceeding because the development of a long term approach to productivity factors and sharing bands under the price cap regulatory plan will significantly affect the environment in which CBT operates, and may have an impact on whether CBT can elect price cap regulation in the future.

CBT is concerned that small and mid-sized companies are often overlooked in discussions which examine the impact that the emergence of competition will have on the telecommunications industry. The Telecommunications Act of 1996 brings competition closer to reality for all LECs, both large and small. In this context, all companies must be given an equal opportunity to compete.

¹ Price Cap Performance Review for Local Exchange Carriers, CC Docket No. 94-1, Notice of Proposed Rulemaking, released September 27, 1995.

If small and mid-sized companies are to survive in the new competitive telecommunications market, they must be given added flexibility to respond in that market. The two NPRMs in which the Commission has addressed issues related to flexibility both in pricing and in developing productivity factors may be helpful in responding to the emergence of competition in the market.² However, these issues have been addressed only as they relate to existing price cap companies, with no consideration given to the new competitive challenges which smaller and mid-sized LECs will inevitably face.

CBT submits that much of the pricing flexibility proposed for price cap companies through these two NPRMs must be made available to carriers that have not elected price cap regulation. Under the Commission's current proposals, small and mid-sized companies, like CBT, can receive this flexibility only if they elect to operate under price cap regulation. However, the rigidity of those regulations has kept some small and mid-sized LECs, including CBT, from electing price cap regulation.

Currently, CBT is subject to Optional Incentive Regulation ("OIR") for interstate access services.³ When the Commission developed the OIR rules for small and mid-size LECs, OIR

² Price Cap Performance Review for Local Exchange Carriers, CC Docket No. 94-1, Notice of Proposed Rulemaking, released September 27, 1995. Treatment for Operator Services Under Price Cap Regulation, CC Docket No. 93-124; Revisions to Price Cap Rules for AT&T, CC Docket No. 93-197, Notice of Proposed Rulemaking, released September 20, 1995.

³ The rules articulated by the Commission for OIR became effective on June 11, 1993. (See, Report and Order, CC Docket No. 92-135, *adopted* May 13, 1993, *effective* June 11, 1993.) CBT's initial tariff filing under the OIR regulations was made on October 1, 1993, with an effective date of January 15, 1994. In March of 1995, CBT filed its first biennial OIR tariff filing.

was envisioned as a step on a continuum toward price cap regulation and away from rate of return. These rules recognized the fact that small and mid-size carriers required additional flexibility to respond to increased challenges.⁴ CBT initially elected OIR because it provided a degree of regulatory and pricing flexibility that did not exist under rate of return regulation.

While CBT has periodically considered moving to price cap regulation⁵, CBT has consistently determined that under the Commission's price cap regulations, small and mid-size service providers, such as CBT, are unable to meet the price cap productivity levels.⁶ Any action taken by the Commission which results in even less flexibility under price cap regulations, such as the adoption of a single X-factor, will place the price cap regulatory scheme further out of reach of most small and mid-sized carriers.

II. CBT OPPOSES THE DEVELOPMENT OF A SINGLE X-FACTOR FOR ALL LECs OPERATING UNDER PRICE CAP REGULATION.

The Commission has requested specific comment on whether a long term price cap plan should include multiple productivity factors or only a single productivity factor. In order to encourage more LECs to choose to operate under price cap regulation, CBT believes that the

⁴ Report and Order, CC Docket No. 92-135, *adopted* May 13, 1993, *effective* June 11, 1993.

⁵ Contrary to the assertion by Time Warner in its Comments, CBT does not and has not operated under price cap regulations. Comments of Time Warner, p. 5, fn. 5. Time Warner argues, without offering support, that greater flexibility in the market will result only in increased profits for the LECs. Such an argument ignores the emergence of competition in the marketplace, particularly the competition envisioned by the Telecommunications Act of 1996.

⁶ This conclusion was supported by a productivity study submitted to the Commission by CBT on June 19, 1989. See, CBT's Comments, CC Docket No. 87-313, filed June 19, 1989.

Commission must develop multiple X-Factors. A single X-Factor would not reflect differences in the economic conditions faced by each individual LEC, nor does a single X-Factor reflect the differing economies of scale, the market conditions faced by the specific LEC or the historical pricing and earnings philosophy of the LEC.

CBT encourages the Commission to consider the comments offered in this proceeding which recommend multiple productivity factors.⁷ While these commenters do not all agree on the best means of encouraging carriers to select an appropriate X-factor, they correctly recognize that the heterogeneity of carriers does not support the development of a single X-factor. Commenters which call for a single X-factor, such as BellSouth and GTE, ignore the differences which exist among carriers.⁸ These companies fail to recognize the important factors which other commenters argue lead to lower productivity levels for certain LECs.

SNET, Southwestern Bell, U.S. West, and CBT argue that lower X-factors are necessary to take account of the inherent differences that exist between LECs due to the size of the carrier, the geographic nature of the territory being served, and the economies of density, scale and scope.⁹ CBT further argues that rather than simply allowing a lower X-factor to small companies, a separate tier of X-factors be developed to respond to the specific parameters of the carriers involved. Both large and small carriers would be provided a set of options which would reflect the broad knowledge available to the Commission concerning the carriers' capabilities

⁷ See Comments of SNET, pp. 4, 6; Comments of Lincoln, p. 11; Comments of Southwestern Bell, p. 26; Comments of U.S. West, p. 8; Comments of International Communication Association, p. 2.

⁸ Comments of BellSouth, pp. 34-37; Comments of GTE, pp. 37-41.

⁹ Comments of SNET, pp. 7, 10; Comments of Southwestern Bell, pp. 26 fn. 34, 34; Comments of U.S. West, pp. 21, 22.

based on common characteristics, while still permitting the carriers to use their awareness of their specific capabilities to choose the appropriate X-Factor within the range of options. CBT also asserts that LECs should have the flexibility to select different X-Factors each year.

CBT submits that once competition is present for the carrier the level of the X-factor becomes moot, because price cap regulation is no longer appropriate. This position is supported by several of the commenters to this proceeding.¹⁰ As competition emerges in the market, that competition will ensure that customers receive the benefits of any productivity gains which result.

III. CBT SUPPORTS SIMPLIFIED TOTAL FACTOR PRODUCTIVITY ("TFP") CALCULATIONS.

If the Commission decides to continue to employ X-Factors in the context of price cap regulation, CBT believes that price caps could be made more appealing to small and mid-size LECs if the method of calculating the X-Factor were simplified and did not involve the use of proprietary data. In its comments in the proceeding, CBT expressed its concerns about the complexity of the calculations involved in determining the X-factor under the original Christensen model, as well as the model's reliance on proprietary data.

CBT believes that the updated Christensen model, offered by the USTA in its comments, while resolving CBT's concerns about the use of proprietary data will still be extremely complex for companies to implement. It will require extensive company resources to collect data, populate the model, and analyze the results. The relative cost of complying with this model will

¹⁰ See Comments of NYNEX, p. 6; Comments of Southwestern Bell, p. 28; Comments of Time Warner, p. 2.

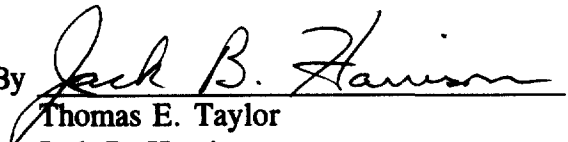
be greater for a smaller company like CBT than for a larger LEC, which will place the smaller company at a competitive disadvantage compared to other telecommunication providers. CBT urges the Commission to explore ways that the X-factor calculation can be simplified for smaller companies. In spite of the complex nature of the Christensen model, CBT believes it yields a relatively more appropriate result than the other proposals that have been put forth in this proceeding.¹¹

IV. CONCLUSION.

CBT urges the Commission to adopt a two-tiered multiple X-factor system that relies on a TFP methodology and recognizes inherent differences between larger LECs and smaller LECs. Such a system will make the price cap regulatory system a more attractive option for small and mid-size LECs.

Respectfully submitted,

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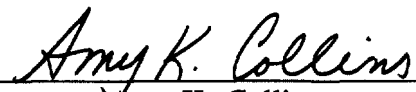
Attorneys for Cincinnati Bell
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Dated: March 1, 1996
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¹¹ See, Comments of AT&T, pp. 27-29 (supporting a performance based model); Comments of GSA, p. 4 (supporting a historical revenue model).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing **Reply Comments of Cincinnati Bell Telephone Company** have been delivered by first class United States Mail, postage prepaid, on March 1, 1996, to the persons on the attached service list.



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